

One Newark Center, 19th Floor Newark, New Jersey 07102 Tel: 973.690.5400 Fax: 973.466.2761 www.rwmlegal.com

September 22, 2015

VIA ECF

The Honorable Esther Salas, U.S.D.J.
The Honorable Joseph A. Dickson, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: WAG v. MultiMedia, et al. (14-cv-02340);

WAG v. WMM, LLC, et al. (14-cv-02345);

WAG v. Flying Crocodile, Inc., et al. (14-cv-02674);

WAG v. Gattyan Group S.à r.l., et al. (14-cv-02832);

WAG v. FriendFinder Networks Inc., et al. (14-cv-03456);

WAG v. Vubeology, Inc., et al. (14-cv-04531); and

WAG v. WebPower, Inc., et al. (15-cv-03581)

Dear Judge Salas and Magistrate Judge Dickson:

On September 11, 2015, the Court issued an Order denying the Defendants' joint motion to dismiss WAG's Complaints. As a result, Defendants must file their respective answers in the above-captioned actions by September 25, 2015. *See* Fed. R. Civ. P. 12(a)(4)(A). With the consent of WAG, we write to respectfully request a 30-day extension, *i.e.*, until October 26, 2015, for Defendants to file their answers.

If this proposal meets with Your Honor's approval, we kindly ask that the enclosed Consent Order be signed and entered on the Court's docket. We thank the Court for its courtesies and consideration.

Respectfully,

s/ Keith J. Miller Keith J. Miller

cc: All counsel of record (via ECF)